



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2023 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHAHRAM HOSSEINIAN,

Defendant.

CR No. 2:23-cr-00425-MCS

I N D I C T M E N T

[18 U.S.C. §§ 2252A(a)(2)(A),
(b)(1): Distribution of Child
Pornography; 18 U.S.C.
§§ 2252A(a)(5)(B), (b)(2):
Possession of Child Pornography]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 2252A(a)(2)(A), (b)(1)]

On or about February 25, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant SHAHRAM HOSSEINIAN knowingly distributed child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using any means and facility of interstate and foreign commerce, namely, an encrypted Internet-based messaging application, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, knowing that the images were child pornography.

1 The child pornography that defendant HOSSEINIAN distributed
2 included the following:

- 3 • An image with the file name "Photo_2@25-02-2021_12-16-
4 44.jpg" depicting a male engaging in anal sexual
5 intercourse with a prepubescent male; and
- 6 • An image with the file name "Photo_3@25-02-2021_12-16-
7 44.jpg" depicting three minor males masturbating in a
8 bathroom.

COUNT TWO

[18 U.S.C. §§ 2252A(a)(5)(B), (b)(2)]

On or about October 6, 2021, in Los Angeles County, within the Central District of California, defendant SHAHRAM HOSSEINIAN knowingly possessed a Samsung Galaxy S10+, bearing IMEI 352689101330268, and a Samsung 256 EVO Select Micro SD Card, bearing serial number KNGG07EAM942, which contained the following images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images involved a prepubescent minor and a minor who had not obtained 12 years of age, that had been mailed and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer and cellular phone, knowing that the images were child pornography:

- A video file titled "babyboyused.mp4" depicting a toddler bound to a board while an adult male defecates and urinates on the toddler, digitally touches the toddler's penis and anus, and then ejaculates on the toddler's anus;
- A video file titled "6Yo Babyj - Bedtime Rape Until Cum.mpg" depicting an adult male performing oral sex on a prepubescent female, and then forcing his penis into her vagina; and

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- A video file titled "Cum In My Mouth Daddy. 1%3a59 .mp4" depicting an adult male touching his penis against a prepubescent female's mouth and ejaculating into her mouth.

A TRUE BILL

/s/

Foreperson

E. MARTIN ESTRADA
United States Attorney

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Assistant United States Attorney
Chief, Criminal Division



SCOTT M. GARRINGER
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